

Message

From: Gillian Wee [wee@stripe.com]
Sent: 2/18/2022 12:55:31 AM
To: Will Parker [wilsonp@peoplespayments.com]
CC: peoplestrust-contact@stripe.com; Nick Rousseau [nickrousseau@stripe.com]; PCS Compliance [pcscompliance@peoplescardservices.com]; Heather Rheame [heatherr@peoplestrust.com]; Howard Klein [howard@peoplespayments.com]; Mihnea Cirica [mihneac@peoplescardservices.com]
BCC: danalexander@stripe.com
Subject: Re: URGENT: Emergencies Act - Impact on Canadian Crowdfunding Merchants and Payment Service Providers - ACTION REQUIRED
Attachments: MIDS 2_17_22.pdf

Will,

I'm responding back regarding your questions about the Ontario Restraint Order (the "Restraint Order") and the Emergencies Act Order and Regulations (the "Regulations").

Ontario Restraint Order.

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- Stripe Payments Canada, Ltd. ("SPCL" or "Stripe") has taken appropriate actions to comply with the Restraint Order, including pausing charges and pay-outs for the applicable Canadian campaigns, including the "Adopt-a-Trucker" campaign identified in the restraint order. Stripe has in our possession donations made to the "Adopt-a-Trucker Campaign. As of February 17, the account balance for the Canadian "Adopt-a-Trucker" campaign is \$375,874.68 CAD. We note that the "Freedom Convoy 2022" campaign is a U.S. campaign that was being processed with our U.S. financial partners, without involvement by SPCL.
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- Based on our review, the MIDs sent over do not appear to be linked to campaigns identified in the Restraint Order. We are, however, taking actions to freeze activity on the accounts linked to the MIDs listed in the attached document because we have determined that they are controlled by designated persons under the Regulations, in accordance with the process below.

Emergencies Act Order and Regulations.

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- Based on our review, Stripe provides payment processing services in Canada to the following crowdfunding platforms: Donorbox, GoFundMe CA, Simplyk, Galabid, Crowdfunder, Facebook, MEE6, GiveSendGo, Fundly, Chuffed, Betterworld, and WeFund4u.com. Stripe is sending communications to each of these platforms to ensure they are aware of the Regulations and are taking immediate steps to comply with the Regulations.
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- Stripe has also submitted a pre-registration to FINTRAC as a payment service provider.
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- Stripe has established a process for determining if we are in possession or control of property owned, held, or controlled by or on behalf of a designated person. This process involves reviewing lists of potential designated persons or implicated accounts provided to us by external sources as well as conducting internal due diligence to identify accounts potentially controlled by designated persons.
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- Stripe is complying with its duty to cease dealings by freezing all activity on accounts we identify as controlled by designated persons pursuant to the process described above. To-date, we have taken these freeze actions with respect to all accounts identified as controlled by designated persons.
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- Stripe will reach out to further clarify request #12.

We are evaluating, on an ongoing basis, with our counsel, incremental steps necessary to comply with the Restraint Order and the Regulations. Given the sensitive nature of events, Stripe has high level attention on the matter.

We'd be happy to answer any questions you may have.

Thanks,
Gillian.

On Thu, Feb 17, 2022 at 7:05 PM Gillian Wee <wee@stripe.com> wrote:
Will,

We are juggling numerous partner requests and will be getting back to you shortly.

Thanks,
Gillian.

On Thu, Feb 17, 2022 at 6:32 PM Will Parker <WilsonP@peoplespayments.com> wrote:

Hi Gillian,

Can you provide an update on where your team is with the information requested by Mastercard? We need to ensure we have this information tonight so we can review and relay to Mastercard tomorrow morning.

Regards

Wilson Parker | Senior Compliance Analyst

Peoples Group

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From: Gillian Wee <wee@stripe.com>

Sent: Thursday, February 17, 2022 12:15 PM

To: Will Parker <WilsonP@peoplespayments.com>

Cc: peopletrust-contact@stripe.com; Nick Rousseau <nickrousseau@stripe.com>; PCS Compliance <pcscompliance@peoplescardservices.com>; Heather Rheume <HeatherR@peopletrust.com>; Howard

Klein <howard@peoplespayments.com>; Mihnea Cirica <MihneaC@peoplescardservices.com>

Subject: Re: URGENT: Emergencies Act - Impact on Canadian Crowdfunding Merchants and Payment Service Providers - ACTION REQUIRED

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Thanks Will. I am acknowledging receipt and am following up internally.

Gillian.

On Thu, Feb 17, 2022 at 11:28 AM Will Parker <WilsonP@peoplespayments.com> wrote:

Hi Gillian and Nick,

Updating this thread with a consolidated list of action items related to the Emergencies Act / Crowdfunding so we can effectively track together.

1. On the Mastercard Inquiry (Items 1-5 below, separate thread attached). Please confirm you are on track to deliver a complete response today.
2. On the remaining items (6-12), please provide a status update on each.

If you have any questions, please let us know.

Item	Request for Stripe to Action	Status
Mastercard Inquiry on February 15, 2022 – Due February 17, 2022		
(In relation to Ontario Restraint Order - pursuant to section 490.8(3.1) of the Criminal Code, this order may be issued in respect of property situated outside Canada)		
1.	Stripe to immediately suspend of all processing and settlement activities for MIDs identified by Mastercard (MIDs provided in our email of February 16, 2022)	
2.	Stripe to identify and confirm which of the GiveSendGo MIDs specifically had and/or currently are processing transactions for	

	the campaigns referenced in the Ontario Restraint Order.	
3.	Stripe to confirm in writing if they have in their possession “any and all monetary donations made through the Freedom Convoy 2022 and Adopt-a-Trucker fundraising campaign pages hosted by GiveSendGo (www.givesendgo.FreedomConvoy2022 , www.givesendgo.com/Warroomcanadanet , respectively), including monetary donations which have been transferred by GiveSendGo or its third-party payment processors to the benefit of the campaign recipients as named on the said campaign pages, being “Chris Garrah” and “Incorporated Freedom 2022 Human Rights and Freedom Association”, or to the company “Freedom 2022 Human Rights and Freedoms” (Canadian corporation number 1372685-1).”	
4.	If yes to the item 3, Stripe to provide written confirmation that they have applied necessary controls to comply with the Ontario Restraint Order.	
5.	If yes to item 3, Stripe to provide PTC information relating to “status of the property, including but not limited to, the balance of all donations held in relation to the Freedom Convoy 2022 and Adopt-a-Truck fundraising campaigns.”	
Items resulting from <i>Emergencies Act</i> – Order and Regulations		
6.	Stripe to identify and provide a written list of all crowdfunding platforms to which they provide payment processing services.	
7.	Stripe to determine if they are in possession or control of property that is owned, held or controlled by or on behalf a designated person which is any individual or entity that is engaged, directly or indirectly, in an activity prohibited by sections 2 to 5 of the <i>Emergency Measures Regulations</i> and inform Peoples of such determination in writing.	
8.	Stripe to provide, in writing, status on registration with FINTRAC if they are in possession or control of property that is owned, held or controlled by or on behalf a designated person which is any individual or entity that is engaged,	

	directly or indirectly, in an activity prohibited by sections 2 to 5 of the Emergency Measures Regulations.	
9.	Stripe to advise in writing how they will determine (i) if crowdfunding platforms (raising funds or virtual currency through donations) are in possession or control of property that is owned, held or controlled by or on behalf a designated person which is any individual or entity that is engaged, directly or indirectly, in an activity prohibited by sections 2 to 5 of the Emergency Measures Regulations; and (ii) ensure registration by such crowdfunding platforms with FINTRAC.	
10.	Stripe to advise in writing how they will comply with the duty to determine – determine on a continuing basis whether they are in possession or control of property that is owned, held or controlled by or on behalf of a designated person.	
11.	Stripe to advise in writing that they have complied with the duty to cease dealings as prescribed by Section 2(1) of the <i>Emergency Economic Measures Order</i> .	
12.	Stripe to provide Peoples with raw transaction data for all transactions Stripe processed to date for crowdfunding platforms.	

Regards

Wilson Parker | Senior Compliance Analyst

Peoples Group

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From: Will Parker

Sent: Tuesday, February 15, 2022 2:25 PM

To: wee@stripe.com; peopletrust-contact@stripe.com; Nick Rousseau <nickrousseau@stripe.com>

Cc: PCS Compliance <pcscompliance@peoplescardservices.com>; Heather Rheaume <HeatherR@peopletrust.com>

Subject: URGENT: Emergencies Act - Impact on Canadian Crowdfunding Merchants and Payment Service Providers - ACTION REQUIRED

Importance: High

Good Afternoon,

Please find attached an URGENT REGULATORY NOTICE from Peoples Group regarding the *Emergencies Act* invoked by the Federal Government of Canada, and its impact on Crowdfunding merchants and Payment Service Providers. **We ask that you review and provide the information requested in the notice by EOD today, Feb 15th, 2022.**

Regards

Wilson Parker | Senior Compliance Analyst

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